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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ROBERT PONZIO, KARINA
KLOCZKO, JESSICA IRENE
MILLER, ALEX ACUNA, BRIAN
MADSEN, VANESSA M.
MONTGOMERY, ROBERT MULL
HADIYA NELTHROPE, and
SAMUEL SALGADO, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

vs.

MERCEDES-BENZ USA, LLC and
DAIMLER AG,

Defendants.

No. 1:18-cv-12544-JHR-JS

Document Electronically Filed

MOTION DATE: January 19, 2021

**DEFENDANTS DAIMLER AG AND
MERCEDES-BENZ USA, LLC'S
NOTICE OF EXPEDITED MOTION
TO STAY PENDING APPROVAL
OF NATIONWIDE CLASS
SETTLEMENT IN OVERLAPPING
CLASS ACTION PROCEEDING**

Oral Argument Requested

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 19, 2021, the undersigned, attorneys for Defendants Mercedes-Benz USA, LLC (“MBUSA”) and Daimler AG (“Daimler”) (collectively, “Defendants”), shall apply to the Honorable Joseph H. Rodriguez, United States District Court Judge, District of New Jersey, in Courtroom 5D of the Mitchell H. Cohen Building & U.S. Courthouse located at 4th & Cooper Streets, Room 1050, Camden, NJ 08101, and seek entry of an Order to stay this action pending approval of a proposed nationwide class action settlement in *Pinon v. Daimler AG and Mercedes-Benz USA, LLC*, No. 1:18-cv-03984, Dkt. No. 70 (N.D. Ga. filed Dec. 21, 2020).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Defendants shall rely on the accompanying Brief in Support of Motion, the concurrently filed Exhibits A-F, Proposed Form of Order, and all other pleadings and memoranda on file in this matter.

PLEASE TAKE FURTHER NOTICE that oral argument is requested for this motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

Dated: December 21, 2020

/s/ *Thomas J. Sullivan*

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Attorneys for Defendants
MERCEDES-BENZ USA, LLC and
DAIMLER AG

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of December, 2020, the foregoing was filed and served on counsel of record via the Court's ECF system:

Dated: December 21, 2020

/s/ *Thomas J. Sullivan*

Thomas J. Sullivan